

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATURAL RESOURCES DEFENSE
COUNCIL, INC.,

Plaintiff,

- v. -

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY,

Defendant.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

08 Civ. 2443 (DLC)

ECF Case

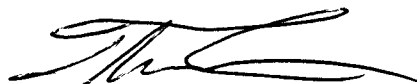
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Thomas Cmar, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Aaron Colangelo
Natural Resources Defense Council
1200 New York Ave., NW, Suite 400
Washington, D.C. 20005
Phone: (202) 289-6868
Fax: (202) 289-1060

Aaron Colangelo is a member in good standing of the Bar of the District of Columbia. There is no pending disciplinary proceeding against Aaron Colangelo in any State or Federal court.

Dated: July 17, 2008
Washington, D.C.

Respectfully submitted,



Thomas Cmar (TC 8791)
NATURAL RESOURCES DEFENSE COUNCIL
1200 New York Ave., NW, Suite 400
Washington, D.C. 20005

JUL 22 2008

91425-657329

Phone: (202) 289-6868

Fax: (202) 289-1060

Counsel for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
NATURAL RESOURCES DEFENSE	:	AFFIDAVIT OF THOMAS CMAR
COUNCIL, INC.,	:	IN SUPPORT OF MOTION TO
	:	ADMIT COUNSEL
Plaintiff,	:	PRO HAC VICE
	:	
- v. -	:	
	:	08 Civ. 2443 (DLC)
UNITED STATES ENVIRONMENTAL	:	
PROTECTION AGENCY,	:	ECF Case
	:	
Defendant.	:	
-----X		

Thomas Cmar, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at the Natural Resources Defense Council, Inc. ("NRDC"), Plaintiff in the above-captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Aaron Colangelo as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bars of the States of New York and Massachusetts, in which I was admitted to practice law in January 2005 and December 2004, respectively. I am admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Aaron Colangelo since October 2006.

4. Mr. Colangelo is an attorney at the Natural Resources Defense Council.

5. I have found Mr. Colangelo to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. A certificate of Mr. Colangelo's good standing in the District of Columbia is attached hereto as Exhibit A.

6. Accordingly, I am pleased to move the admission of Aaron Colangelo, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Aaron Colangelo, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Aaron Colangelo, pro hac vice, to represent Plaintiff in the above-captioned matter, be granted.

Dated: July 17, 2008
Washington, D.C.

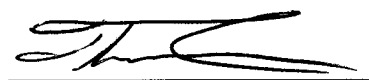
Notarized:

District of Columbia: SS
Subscribed and sworn to before me
this 17th day of July, 2008

Gerard J. Tanco
Gerard Tanco, Notary Public DC

My commission Expires
July Dec. 31, 2012
65

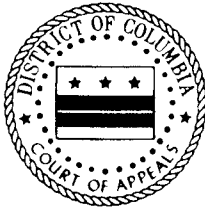
Respectfully submitted,



Thomas Cmar (TC 8791)
NATURAL RESOURCES DEFENSE COUNCIL
1200 New York Ave., NW, Suite 400
Washington, D.C. 20005
Phone: (202) 289-6868
Fax: (202) 289-1060

Counsel for Plaintiff

EXHIBIT A



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

AARON S. COLANGELO

was on the 10TH day of JULY, 2000
duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on July
15, 2008.

GARLAND PINKSTON, JR., CLERK

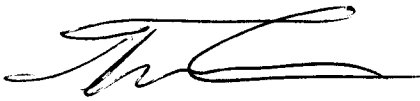
By: M. Charles
Deputy Clerk

EXHIBIT B

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served a true and correct copy of **Plaintiff's Motion to Admit Counsel Pro Hac Vice, Affidavit of Thomas Cmar in Support of Motion to Admit Counsel Pro Hac Vice, Certificate of Good Standing, and Proposed Order for Admission Pro Hac Vice on Written Motion** on the following Counsel, by first-class mail, on this date, July 17, 2008.

Serrin Turner
Assistant U.S. Attorney
86 Chambers Street
New York, NY 10007

A handwritten signature in black ink, appearing to be 'TC', written over a horizontal line.

Thomas Cmar

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NATURAL RESOURCES
DEFENSE COUNCIL, INC., Plaintiff,

08 cv 2443 (DLC)

- against -

U.S. ENVIRONMENTAL Defendant.
PROTECTION AGENCY,

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Thomas Cmar attorney for Natural Resources Defense Council
and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Aaron Colangelo

Firm Name: Natural Resources Defense Council

Address: 1200 New York Ave., NW, Suite 400

City/State/Zip: Washington, D.C. 20005

Telephone/Fax: Phone: (202) 289-6868/Fax: (202) 289-1060

Email Address: acolangelo@nrdc.org

is admitted to practice pro hac vice as counsel for Natural Resources Defense Council in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

United States District/Magistrate Judge